Case 1:18-cr-00735-KPF Document 55 Filed 09/18/20 F

## MEMO ENDORSED

## Federal Defenders OF NEW YORK, INC.

Southern District 52 Duane Street-10th Floor, New York, NY 10007 Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director

Southern District of New York Jennifer L. Brown Attorney-in-Charge

September 17, 2020

VIA ECF
Honorable Katherine Polk Failla
United States District Judge
Southern District of New York
United States Courthouse
40 Centre Street
New York, New York 10007

Re: United States v. Daniel Zavala, 18 CR 735 (KPF)

Dear Judge Failla:

With the consent of pretrial services and the government, I write to seek a modification to Mr. Zavala's bail conditions so that he can travel from California, where he resides and is supervised, to Tuscon, Arizona to visit his sister who is expecting a child. If permitted to travel, Mr. Zavala will travel between September 25 and October 2, 2020. He will provide a detailed itinerary, including contact information, to his supervising pretrial officer before leaving.

Mr. Zavala has been subject to pretrial supervision since his arrest in July of 2018 and has not been the subject of any violations. The government and pretrial services do no object to this application.

Respectfully submitted,

/s/ JULIA GATTO

Julia L. Gatto Assistant Federal Defender

cc: AUSA Justin Rodriguez (via ECF) NY-USPO Robert Trail (via email) CA-USPO Gallenberger (via email)

Application GRANTED.

Dated: September 18, 2020

New York, New York

SO ORDERED.

HON. KATHERINE POLK FAILLA UNITED STATES DISTRICT JUDGE

Katherin Palle Fails